

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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JOSHUA J. BELOW

by his Guardian, DEBRA BELOW,  
CHARLIE ELIZABETH BELOW., a minor  
By her Guardian ad Litem, DANIEL A. ROTTIER,

PATRICK JOSHUA BELOW., a minor  
by his Guardian ad Litem, DANIEL A. ROTTIER,

**CASE NO.: 3:15-cv-00529-wmc**

Plaintiffs,

DEAN HEALTH PLAN, INC.

Involuntary Plaintiff,

v.

STAR BLUE BELOW-KOPF

Intervening Plaintiff,

v.

YOKOHAMA TIRE CORPORATION,  
ABC INSURANCE COMPANY,  
YOKOHAMA CORPORATION OF AMERICA,  
DEF INSURANCE COMPANY,  
YOKOHAMA CORPORATION OF NORTH AMERICA,  
GHI INSURANCE COMPANY,  
YOKOHAMA TIRE MANUFACTURING VIRGINIA, LLC.,  
JKL INSURANCE COMPANY,  
YOKOHAMA RUBBER COMPANY, LTD.,  
MNO INSURANCE COMPANY.

Defendants

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**PLAINTIFFS' SUBMISSION ON VOIR DIRE**

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Plaintiffs, by their attorneys, Habush Habush & Rottier, S.C., respectfully submit the following proposed voir dire questions and a brief description of plaintiffs' claims and defendants' defenses:

### **VOIR DIRE QUESTIONS**

1. Have you or a family member ever worked in the tire industry, whether in the manufacturing area or in the retail area?
  - a. If so, please explain.
2. Have you or a close family member ever experienced a sudden blowout of a tire while operating a motor vehicle at highway speeds?
  - b. If so, please explain.
3. Do you believe the jury system is an appropriate way to determine whether a manufacturer has designed or manufactured an unreasonably dangerous product?

### **PLAINTIFFS' STATEMENT OF CASE**

On September 14, 2013 the Plaintiff Joshua Below was traveling westbound on Interstate 94 in Monroe County. He was operating his 2005 GMC Sierra Extended-Cab pickup truck. The truck was equipped with four Yokohama tires. The right rear tire detreaded and blew out. The truck left the roadway toward the median and rolled two-and-a-half times, coming to rest on its roof. Mr. Below contends through his attorneys that the Yokohama tire was improperly designed, improperly manufactured and failed to warn as to certain aspects of its performance. The Yokohama defendants deny all such allegations. Plaintiff Joshua Below contends he suffered injuries in the accident and the defendants dispute the existence and extent of those injuries.

Dated this 27th day of January, 2017

HABUSH HABUSH & ROTTIER S.C.<sup>®</sup>  
Attorneys for Plaintiffs

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